

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, MICHELLE
K. TASSINARI, DEBRA O'MALLEY, AMY
COHEN, NATIONAL ASSOCIATION OF
STATE ELECTION DIRECTORS, allegedly
in their individual capacities, and WILLIAM
FRANCIS GALVIN, in his official capacity as
Secretary of State for Massachusetts,

Defendants,

and

TWITTER, INC.,

Proposed Additional
Defendant.

Case No. 1:20-cv-11889-MLW

PROPOSED ADDITIONAL DEFENDANT
TWITTER INC.'S NOTICE OF INTENT TO OPPOSE JOINDER

Proposed Additional Defendant Twitter, Inc. ("Twitter"), by and through its undersigned counsel, hereby notifies this honorable Court and the parties of its intention to oppose Plaintiffs' motion for leave to file a second amended complaint (Dkt. No. 64) joining Twitter as an additional Defendant in this action. This notice is timely filed in accordance with the terms of this Court's Order of March 25, 2021 (Dkt. No. 75) because Twitter is filing the notice within 10 days of service (Dkt. No. 80). In further conformity with that Order, Twitter will file such opposition within the time prescribed by the Order, i.e., by April 28, 2021. Twitter further states that neither the filing of this notice, the appearance of counsel, nor the filing of its forthcoming opposition is

intended to waive any applicable argument or defense that it may have relating to this action, and that it hereby expressly reserves all such arguments and defenses, including but not limited to its rights to contest personal jurisdiction and venue, and its rights to move to transfer, stay, or dismiss any claim that may be permitted to be asserted against it in this Court.

Respectfully submitted,

/s/ Felicia H. Ellsworth
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***Attorneys for Proposed Additional
Defendant TWITTER, INC.***

Dated: April 18, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on April 18, 2021.

/s/ Felicia H. Ellsworth
Felicia H. Ellsworth